

I. Background

In reporting the results of its OSS testing conducted within the five-state SBC Midwest region, BearingPoint originally determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for reported trouble on UNE circuits in Michigan, and for Special circuits in Illinois, Indiana, Michigan and Ohio. To address this issue, SBC Midwest developed a Repair Coding Accuracy Plan ("the Plan"), which detailed several initiatives the Company would implement to improve upon the accuracy of the coding used on trouble ticket closures. One of those initiatives entailed ongoing management reviews of the coding applied by various work center staff on a monthly or bi-monthly sample of closed tickets. The Plan called for SBC to provide each state commission with a quarterly report of the results of these management reviews and any corrective actions taken to address any shortcomings identified.

SBC Midwest published its first quarterly report (for reviews conducted between April 1, 2003 and June 30, 2003) on July 31, 2003. That report not only provided a summary of the results of the reviews being conducted by the three SBC Midwest organizations directly involved in trouble ticket coding (i.e., the Local Operations Center ("LOC"), the Installation and Repair Centers ("I&R"), and the Special Services Test Centers ("SSTC")), but also provided a detailed description of the processes employed in conducting the reviews.

In addition to the internal reviews conducted by SBC, the Plan had also described the third-party verification procedure, which included both an examination of a sampling of actual UNE and Special circuit closures by an independent third-party evaluator, as well as a third-party verification of the completion of the Plan's initiatives. Similar to SBC's reporting requirement, the Plan called for the third-party evaluator, BearingPoint, to provide a final report of its examination to the commissions shortly after the completion of its analysis.

BearingPoint published its final Third Party Examination Results report on September 18, 2003. That report showed that SBC Midwest had exceeded the Plan's target accuracy level for samples of both circuit categories, and verified that the Plan's initiatives had been met.¹

II. Purpose

In the following sections, SBC first summarizes the results obtained from the management reviews conducted during the 3rd quarter of 2003 and corrective actions taken to address any shortcomings. SBC then provides a summary of the progress made towards completing the last remaining action item detailed within the Plan – coding refresher training.

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¹ SBC Midwest notes that two action items, the coding refresher sessions to be conducted though the end of 2003 and the reporting of management review results that continue until April 2006, are not fully complete due to the nature of their implementation requirements. BearingPoint did, however, verify that both action items are currently underway.



III. Summary Results

The results of the management reviews in each of the three work groups are summarized in the following table.

Trouble Ticket Coding Accuracy Reviews – July, August, September '03

Work Center	Quantity of Tickets Reviewed	Quantity of Correct Closures	Percentage Accurate%	Corrective Actions Taken
SSTC*				
• July Specials	128	123	96.1%	Note 1
• August Specials	87	85	97.7%	Note 1
September Specials	52	50	96.2%	Note 1
LOC**				
• UNE-P	1628	1270	78.0%	Note 2
• UNE-L	2278	2141	94.0%	Note 3
I & R				
• July UNE	19142	17532	91.6%	Note 4
• August UNE	24665	23742	96.3%	Note 4
• September UNE	20697	19513	94.3%	Note 4

^{*} Results reported previously include both CLEC and SBC specials

Notes:

- 1) The previous quarter's results contained both retail and wholesale (CLEC) special services types, not solely wholesale. In this report, only wholesale results are reported. A special analysis of the few errors encountered revealed that none resulted in inappropriate CLEC billing, nor did any involve situations whereby a measurable fault was incorrectly coded as non-measurable.
- 2) Analysis of the errors revealed that most were due to one of the following two situations: 1) troubles found to be caused by "customer error" (e.g., receiver left off hook code 1371) were improperly closed as CLEC "test-only" requests (code 1363); and 2) tickets involving requests for trouble information that could have been obtained electronically by the CLEC themselves (code 1134) were improperly closed as manual information requests (code 1131). A reminder of correct coding procedures for both situations was provided to all LOC personnel, and LOC management

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^{**} Results from the bi-monthly review (July-August '03).

decided to revert back to 100% reviews of all pending ticket closures.² In addition, those individuals identified as causing the majority of the errors received special coaching and a warning of further corrective action if improvement is not achieved.

- 3) There is a continued improvement over previous bi-monthly internal results. No common trends have been identified, e.g., recurring incorrect codes and/or the same individuals responsible for the errors. As the errors are found, the responsible individual is notified and coached. The LOC manager reviews each error and discusses it with the associate, and provides individual instruction and coaching on the correct code usage.
- 4) The I&R monthly reviews analyze not only the accuracy of the ticket closure coding, but also the quality and completeness of the narratives provided at the time of closure. As such, these results include both coding and narrative accuracy/completeness. A closer study of the July discrepancies in Illinois revealed that of the 1560 discrepancies identified (out of 15,933 tickets reviewed), 716 were due to coding errors and 844 were due to poor or incomplete narratives. Elimination of the narrative discrepancies in Illinois alone would have raised the overall (5 state) accuracy level from 91.6% to 96.0%. However, since the narrative discrepancies could not be broken out from the results for all of the states, they are included in the summary totals shown above. SBC notes, however, that regardless of the category of the discrepancy (coding or narrative), a coaching session is always conducted with the individual responsible.

IV. Coding Refresher Training

The Plan had called for a coding refresher review session to be conducted within each of the work groups within one year of the completion date(s) for the initial review sessions described within the Plan. Since all of the initial review sessions were conducted in the third and fourth quarters of 2002, the refresher review sessions are now being scheduled or completed. The current status of these refresher sessions is provided below.

LOC

A 2-day training refresher was conducted for LOC personnel between July 6th and September 5th, 2003.

<u>I & R</u>

I & R personnel within all five Midwest states attended one of the 1.5 hour refresher training sessions conducted between August 1st and August 31st, 2003.

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² Previously, review and approval (prior to ticket closure) was necessary only until the individual achieved a 95% accuracy level.



SSTC

Review sessions for SSTC personnel covering selected portions of SBC-002-200-016 (("SSTC: Special Service Trouble Administration Practice (TAP)") began this month (October 2003) and should complete by the end of the fourth quarter.

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